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Lead Counsel for Court-Appointed Lead Plaintiff and the Class

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

IN RE TEZOS SECURITIES LITIGATION

Master File No. 17-cv-06779-RS

CLASS ACTION

**STIPULATION AND [PROPOSED]
ORDER TO ADD NEW PLAINTIFF**

Judge: Hon. Richard Seeborg

ALL ACTIONS.

1 WHEREAS, Lead Plaintiff Arman Anvari filed a Consolidated Complaint (“Complaint”)
2 (Dkt. No. 108) against Dynamic Ledger Solutions, Inc. (“DLS”), Tezos Stiftung, (“Tezos
3 Foundation”), Kathleen Breitman, Arthur Breitman, Timothy Cook Draper (“Draper”), Draper
4 Associates V Crypto LLC (“Draper Associates Crypto”) and Bitcoin Suisse AG (“Bitcoin Suisse”);

5 WHEREAS, on August 7, 2018, and August 31, 2018 the Court issued orders (Dkt. Nos. 148
6 and 163) granting the motions to dismiss the Complaint filed by Draper, Draper Associates Crypto
7 and Bitcoin Suisse, and dismissing these Defendants from this action with prejudice;

8 WHEREAS, on September 14, 2018, DLS, the Tezos Foundation, Kathleen Breitman and
9 Arthur Breitman (collectively, “Defendants”) filed their answers (Dkt. Nos. 168-171) to the
10 Complaint;

11 WHEREAS, on November 21, 2018, Pumaro LLC (“Pumaro” and together with Arman
12 Anvari, “Plaintiffs”) was added as a named plaintiff, pursuant to a stipulation and order (Dkt. No.
13 183);

14 WHEREAS, Plaintiffs seek to add Artiom Frunze as a plaintiff to this action; and

15 WHEREAS, Plaintiffs and Defendants have agreed that Artiom Frunze may be added to the
16 Complaint without the need to file an amended pleading and, therefore, amended answers by
17 Defendants;

18 IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel on behalf of
19 Plaintiffs and Defendants that:

20 (a) The Complaint is amended to add plaintiff Artiom Frunze and the following allegation
21 as paragraph 14b:

22 Plaintiff Artiom Frunze is an individual who invested 238 Ethereum in the
23 Tezos ICO on July 2, 2017 and July 3, 2017. He was promised delivery of
24 165,607.38 Tezos tokens upon the conclusion of the Tezos ICO and the launch
of the Tezos network.

25 (b) Defendants, and each of them, answer paragraph 14b as follows :

26 Defendants are without sufficient knowledge or information to form a belief as
27 to the truth of the allegations in paragraph 14b pertaining to Artiom Frunze’s
28 alleged contribution to the Fundraiser, and on that basis deny them. Except as
expressly admitted, Defendants deny each and every remaining allegation of
paragraph 14b.

1 Stipulated and agreed to by:

2 Dated: January 4, 2019

3 LTL ATTORNEYS LLP

4 By: s/ Enoch H. Liang

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Respectfully Submitted,

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15 Attorneys for Defendants Dynamic Ledger
16 Solutions, Inc., Kathleen Breitman, and
Arthur Breitman

Attorneys for Defendant Dynamic Ledger
Solutions, Inc.

17
18 SO ORDERED:

19 Dated: January 7, 2019



The Hon. Richard Seeborg
United States District Judge